

# *Society for Animal Protective Legislation*

PO Box 3719, Washington, DC 20027

telephone: (703) 836-4300

email: [sapl@saplonline.org](mailto:sapl@saplonline.org)

facsimile: (703) 836-0400

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Public Comments of Wendy Swann, representing the Animal Welfare Institute,  
Before the National Organic Standards Board  
Regarding Access to Pasture for Ruminants  
March 3, 2004

Good morning. My name is Wendy Swann, and I represent the Animal Welfare Institute, a non-profit organization founded in 1951 to minimize the sum total of fear, pain and suffering of animals. I submit the following comments on behalf of AWI's legislative division, the Society for Animal Protective Legislation.

As part of its advocacy on behalf of farmed animals, the Animal Welfare Institute (AWI) maintains a farmed animal husbandry standards program and allows farms that abide by its strict husbandry standards to use its name in connection with marketing their products. We are very concerned about maintaining the integrity of organic standards with respect to farmed animal welfare and consumer expectations. We thank you for the opportunity to speak today in support of access to pastures for ruminants.

With the following exceptions, we urge the National Organic Standards Board (NOSB) to adopt the Livestock Committee's Pasture Requirement recommendations.

Ruminants must have substantial access to pasture. Cattle, for example, evolved to graze and browse grasses, herbs, and leaves of the bush and open plains. Cattle travel, on average, about 2.5 miles per day while grazing and will graze up to nine hours a day or, in exceptional cases, when grass is sparse, cattle will graze up to 15 hours per day. They may spend two hours per day going to or searching for suitable grazing sites. Lameness is rare in cows on pasture. Grazing provides both nutrition and exercise. As herbivores, cattle are adapted to high fiber, low density diets and do not adapt easily to high grain diets or manufactured diets with high protein and low fiber. Routine confinement of cattle on slatted or concrete floors has been associated with lameness, which implies poor welfare. Access to quality pasture, exercise, and the ability to graze therefore is essential to the biological and behavioral health of cattle. Furthermore, consumers believe that organic meat and dairy products come from animals who have substantial and legitimate access to pasture.

We support the position of the NOSB that grazed feed must provide a significant portion of the total feed requirements of ruminant animals. In answer to the NOSB Livestock Committee's request for clarifications, we agree with other groups testifying at these hearings, including Cornucopia Institute and Northeast Organic Dairy Producers Alliance, that organic dairy animals, from 12 months of age and up, must consume no less than 30% of their daily dry matter intake from pasture, for a minimum of 120 calendar days per year. To ensure quality grazing, we

agree further that stocking density per acre must not exceed three lactating dairy cows, and may need to be less, as appropriate for soil and climate.

We further support the additional recommendations of these organizations to enhance the definition of “pasture” to mean “land managed to maintain or improve soil, water, and vegetative resources and provide maximum feed value by growing suitable grasses and other forages from which animals graze plant material still connected to its roots.”

With respect to temporary confinement, we support the need to shelter animals during inclement weather that could harm the animals or under other life or health threatening circumstances and in the case of veterinary care to treat disease or injury. We agree with the NOSB Livestock Committee that lactation is not an appropriate stage of production for routine confinement. We agree with the NOSB Livestock Committee recommendation that birth is a stage of production warranting temporary confinement, but only in the case of severely inclement weather (as in winter, when newborn calves could become chilled or when weather could impair the mother’s ability to care for her calf) or in the case of an anticipated difficult birth, for the purpose of improving the farmer’s ability to observe and care for the animal and never as a routine procedure surrounding birth. In general, cattle on pasture are fit, healthy and capable of unsupervised births.

We do not agree with the Livestock Committee that confinement of beef animals during the final finishing stage is appropriate for organic production, *unless* animals must be confined for feeding during seasons when quality pastures are not available or when pastures are poor due to conditions outside the farmer’s control, such as drought. In such cases, cattle should continue to have access to pasture while being fed hay and other feedstuffs that support normal rumen function and deliver sufficient nutrients to maintain health.

Thank you.